

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN**

GREGORY BOYER, as Administrator of the
Estate of Christine Boyer, and on his own behalf,

Plaintiff,

v.

Lead Case No. 20-CV-1123

**ADVANCED CORRECTIONAL
HEALTHCARE, INC., *et al.*,**

Defendants.

GREGORY BOYER, as Administrator of the
Estate of Christine Boyer, and on his own behalf,

Plaintiff,

v.

Case No. 22-CV-723

**USA MEDICAL & PSYCHOLOGICAL
STAFFING, S.C., *et al.*,**

Defendants.

DEFENDANTS' RULE 26(a)(3) DISCLOSURES

Defendants Advanced Correctional Healthcare, Inc., USA Medical & Psychological Staffing, S.C., Lisa Pisney and Amber Fennigkoh submit the following disclosures pursuant to Fed. R. Civ. P. 26(a)(3).

**NAMES OF POTENTIAL WITNESSES
(Rule 26(a)(3)(A)(i)**

Will Call

1. Gregory Boyer
2. Amber Fennigkoh

3. Lisa Pisney
4. Vicki Riley
5. Danielle Warren Nelson
6. Shasta Parker Moga
7. Jeff Schwanz
8. Susan Minter
9. Kimberly Pearson
10. Murray Young
11. Matthew Wolff
12. Dr. Richard Erdman

May Call

13. Jaime Lynch
14. Jessica Young
15. Travis Schamber
16. Norman Johnson
17. Stan Hendrickson
18. Brooke Dempsey
19. Lucas Runice
20. Fritz Degner
21. Ryan Hallman
22. Jeffrey Spencer
23. Kyle Moga
24. Abi Chrudimsky

25. Jeffrey Keller
26. Suzanne Bentley
27. Homer Venters
28. Bruce Charash
29. Hershey Suri

Defendants also reserve the right to call any witness identified by plaintiff in his Rule 26(a)(3) disclosures.

WITNESSES TO BE PRESENTED BY DEPOSITION
(Rule 26(a)(3)(A)(ii))

30. Portions of Deposition of Dr. Richard Erdman (deposition transcript not completed; if schedule does not permit, live testimony)
31. Jaime Lynch (if testimony is relevant to a claim by plaintiff; designation dependent on issues and arguments of plaintiff)

EXHIBITS
(Rule 26(a)(3)(A)(iii))

Will Introduce

501. UW Health Autopsy Report (ACH 880-887)
502. Gundersen Health records (GHS 1-1589)
503. Tomah Health records (TH 1-390)
504. The Medicine Shoppe records (TMS 1-213)
505. Phillips Pharmacy records (PP 1-9)
506. Sparta Ambulance records (SA 1-11)
507. ACH, Monroe County Jail contract/agreements (Monroe_County 19-44)
508. 12/18/19 Travis Schamber email to Jessica Young (Monroe_County 15391)
509. Temporary Sunday Staffing letter/agreement (Monroe_County 45)
510. Monroe County Jail records (Monroe_County 50-110, 1088-1111)
511. Audio recording of phone call at 2338 on 12/21/19 from Christine Boyer to Greg Boyer (Monroe_County 593)

512. Transcript of phone call at 2338 on 12/21/19 from Christine Boyer to Greg Boyer (Monroe_County 593)
513. Audio recording of phone call at 2343 on 12/21/19 from Christine Boyer to Greg Boyer (Monroe_County 594)
514. Transcript of phone call at 2343 on 12/21/19 from Christine Boyer to Greg Boyer (Monroe_County 594)
515. Audio recording of phone call at 1715 on 12/22/19 from Christine Boyer to Greg Boyer (Monroe_County 595)
516. Transcript of phone call at 1715 on 12/22/19 from Christine Boyer to Greg Boyer (Monroe_County 595)
517. Audio recording of phone call at 1750 on 12/22/19 from Christine Boyer to Greg Boyer (Monroe_County 596)
518. Transcript of phone call at 1750 on 12/22/19 from Christine Boyer to Greg Boyer (Monroe_County 596)
519. Audio recording of phone call at 1756 on 12/22/19 from Christine Boyer to Greg Boyer (Monroe_County 597)
520. Transcript of phone call at 1756 on 12/22/19 from Christine Boyer to Greg Boyer (Monroe_County 597)
521. Audio recording of phone call at 1805 on 12/22/19 from Christine Boyer to Greg Boyer (Monroe_County 598)
522. Transcript of phone call at 1805 on 12/22/19 from Christine Boyer to Greg Boyer (Monroe_County 598)
523. ACH timesheet record for Amber Fennigkoh (ACH 13516)
524. 12/22/19 emails between Amber Fennigkoh and Vicki Riley (ACH 19149-19151)
525. Expert report of defendants' expert Kimberly Pearson, RN, CCHP
526. Expert report of defendants' expert Dr. Matthew Wolff
527. Expert report of defendants' expert Dr. Murray Young
528. Expert report of defendants' expert Susan Minter, DNP
529. Demonstrative Exhibit - Medication compliance chart drafted by Susan Minter (Minter Report, page 8)
530. Demonstrative Exhibit – Telemetry recording from Gundersen Hospital demonstrating torsade de pointes (Wolff report, page 9)

- 531. Demonstrative Exhibit – Figure regarding total body potassium deficit as related to serum potassium levels (Wolff report, page 10)
- 532. Gennari FJ, Hypokalemia. *NEJM*, 1998; 339(7): 451
- 533. Brown RS, Potassium homeostasis and clinical implications. *Am J Med*; 1984; 77(5) Suppl 1: 3.
- 534. Transcript of deposition taken in this matter of Suzanne Bentley
- 535. Transcript of deposition taken in this matter of Jeffrey Keller
- 536. Transcript of deposition taken in this matter of Homer Venters
- 537. Transcript of deposition taken in *Belcher v. Lopinto, et al.* of Homer Venters
- 538. Transcript of deposition taken in *Charleston v. Corizon Health, et al.* of Homer Venters
- 539. Transcript of deposition taken in *Fikes v. Abernathy, et al.* of Homer Venters
- 540. Transcript of deposition taken in *Hammonds v. Dekalb County, et al.* of Homer Venters
- 541. Transcript of deposition taken in *Serna v. San Diego, CA, et al.* of Homer Venters
- 542. Transcript of deposition excerpts taken in *Woodward v. Lopinto, et al.* of Homer Venters
- 543. Transcript of deposition excerpts taken in *Zavala v. City of Baton Rouge, et al.* of Homer Venters

May Introduce

- 544. 07/04/19 email from Amber Fennigkoh to Stan Hendrickson (Monroe_County 17959) (Deposition exhibit 70)
- 545. New Practitioner Orientation Agenda (ACH 18912-19147) (Deposition Exhibit 37)
- 546. 12/22/19 email from Shasta Parker to Amber Fennigkoh, Ryan Hallman (Monroe_County 5846)
- 547. Jeffrey Keller's Monroe County Medical Review Project (Excel file)
- 548. Transcript of deposition taken in this matter of Danielle Warren Nelson
- 549. Transcript of deposition taken in this matter of Shasta Parker Moga
- 550. Transcript of deposition taken in this matter of Amber Fennigkoh
- 551. Transcript of deposition taken in this matter of Lisa Pisney

- 552. Transcript of deposition taken in this matter of Travis Schamber
- 553. Transcript of deposition taken in this matter of Brooke Dempsey
- 554. Transcript of deposition taken in this matter of Ryan Hallman
- 555. Transcript of deposition taken in this matter of Kyle Moga
- 556. Transcript of deposition taken in this matter of Jeff Schwanz
- 557. Transcript of deposition taken in this matter of Stan Hendrickson
- 558. Transcript of deposition taken in this matter of Vicki Riley
- 559. Transcript of deposition taken in this matter of Greg Boyer
- 560. Transcript of deposition taken in this matter of Jaime Lynch
- 561. Transcript of deposition taken in this matter of Norman Johnson
- 562. Transcript of deposition taken in this matter of Jessica Young
- 563. Transcript of deposition taken in this matter of Bruce Charash
- 564. Transcript of deposition taken in this matter of Susan Minter
- 565. Transcript of deposition taken in this matter of Murray Young
- 566. Transcript of deposition taken in this matter of Matthew Wolff
- 567. Transcript of deposition taken in this matter of Rick Erdman
- 568. Transcript of deposition taken in this matter of Hershey Suri (to be completed)

Defendants also reserve the right to offer any exhibit identified by plaintiff in his Rule

26(a)(3) disclosures.

Dated in Milwaukee, Wisconsin, this 1st day August, 2025.

LEIB KNOTT GAYNOR LLC

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